

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA**

**v.**

**REGINALD ARBRAHAM,**

**Defendant.**

**Crim. No. 17-cr-10269-WGY**

**ASSENTED-TO MOTION FOR A PROTECTIVE ORDER**

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure and Rule 116.6(B) of the Local Rules of the United States District Court for the District of Massachusetts (“Local Rules”), the United States of America hereby makes this motion for this Court to enter a protective order with regard to the detention hearing discovery materials produced by the government pursuant on September 11, 2017 (hereinafter “discovery materials”). Counsel for the Defendant assents to this motion.

In support of this motion, the government states:

1. On September 6, 2017, Reginald Abraham was arrested on federal sex trafficking charges. The defendant was arraigned on September 12, 2017, and a detention hearing is scheduled for September 19, 2017, at 3:30 p.m.
2. The discovery materials contain identifying information of cooperating witnesses and victims in this case. Disclosure of the identities of the cooperating witnesses and victims to

the defendant at this stage in the litigation could create serious risks to the safety of these individuals.

3. Accordingly, the Government requests that the Court enter the following protective order: upon receipt of the discovery materials, counsel for the Defendant must maintain control of the discovery materials at all times and must not transfer the materials to his client. Although counsel may discuss the discovery materials with Defendant, the discovery materials shall not be left with or given to the Defendant, whether he is incarcerated or released. In addition, counsel for the defendant may not share the names of cooperating witnesses and victims with the defendant prior to the detention hearing.

Respectfully submitted,

WILLIAM D. WEINREB  
Acting United States Attorney

/s/ *Miranda Hooker*  
MIRANDA HOOKER  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that this document was filed on the date listed below through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ *Miranda Hooker*  
Miranda Hooker  
Assistant United States Attorney

Dated: September 12, 2017